

# **Exhibit E**

# Morgan Lewis

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September 14, 2022

**VIA EMAIL**

Edward P. Sullivan, Special Assistant U.S. Attorney  
& Senior Litigation Counsel  
Heidi B. Gesch, Assistant U.S. Attorney  
United States Attorney's Office  
for the Eastern District of Virginia  
Justin W. Williams United States Attorney's Building  
2100 Jamieson Avenue  
Alexandria, VA 22314

**Re: United States v. Julio R. Sotomayor, 1:22-cr-00122-RDA-1**

Dear Ed and Heidi:

This letter follows up on our August 22 and August 31 correspondence and addresses an additional request based on further review of the first two document productions.

We have found documents that show the FBI and your office served subpoenas on, and have received documents from, certain parties that are relevant to the charges in the indictment and other conduct that we have previously discussed. These parties are (1) LLH & Associates, LLC (FBI-00058342, FBI-00058344) (2) World-Class Defense, LLC, (3) Crystal DiGiovacchino, (4) Aer Potentia, and (5) Juan Carlos Arevalo (FBI-00058339).

Laura Hineman provided your office with documents from LLH & Associates, LLC, described in FBI-00058344, including communications with our client, that do not appear to have been produced. Crystal DiGiovacchino provided 2,095 pages of documents related to Juan Carlos Arevalo and the entities listed above that, similarly, do not appear to have been produced. FBI-00058339 also refers to the documents provided by Crystal DiGiovacchino as a "partial production" which, presumably, indicates she has since provided more materials in the intervening ten months.

If these materials have been produced to us, we ask that you provide the bates range of these documents. Given that none of the individuals and entities identified above were listed as custodians in the first two productions, we have not been able to readily identify documents that are associated with these subpoenas. If they have not been produced, we request that you provide all the data that you have collected from these parties as soon as possible.

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We also note that we were able to manually reformat and input the data provided for the PROD-BEGATTACH and PROD\_ENDATTCH fields. The metadata provided did not work with our document review software.

We remain available to discuss the matters we have raised so far. Thank you for your anticipated cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Pease III", with a long horizontal flourish extending to the right.

John J. Pease III

cc: Jonathan York, Esq.